



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARON COINS, LLC
25 DE WISCONSIN AVE, SUITE 1800
(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

7:21 Civ. 02777(VB) ()

- against -

SONEA GRIFFITHS
151 PARK AVE.
MOUNT VERNON, NY 10550
(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

ANSWER

I

ADMISSIONS AND DENIALS

In this section, state which factual allegations in the complaint you admit to and which factual allegations you deny. You should refer to the complaint paragraph by paragraph (and sentence by sentence within each paragraph), in the same order as the paragraphs and sentences appear in the complaint. Attach additional sheets of papers as necessary.

1. Deny allegations in Complaint. Believe
2. that Sonea Griffiths was a victim of
3. cyber fraud by a criminal enterprise.
4. The facts are: Sonea received an
5. anonymous call from someone
6. identifying himself as John Anderson
7. and then as "John Parker". They asked
8. if she could find sellers of diesel
9. engines. After she said yes could help
10. she was asked if she knew how to

Purchase Bitcoin. Once she said yes (she had very small PRIOR experience) she was asked to source the sellers. She never contacted anyone and never had details, phone numbers email etc.

She was contacted - gave information she had researched, and told that she would receive a transfer into her account and given detailed instructions on how to go make the purchases. She was told to call and use the plaintiff and to have the Bitcoin put into a wallet that was not her wallet.

She does not know if the plaintiff was involved in the fraud but was told to contact plaintiff and use another wallet that she had no control over.

Her Bank statement shows large transfers into her account from CBY, a subsidiary of Black and Decker, this was her expectation - that she would provide information to Parker

(who represented to her that he worked for CDIF).

CDIF would pay a sum to her Bank account which she was told was for the deposit for purchase by CDIF from the companies she had provided to Parker plus 2% commission.

Parker gave her detailed instructions on how to use the money to buy Bitcoin. She was told to only purchase Bitcoin from the Plaintiff and had to transfer it into a wallet that was not her wallet and over which she had no control.

TD Bank saw large transactions and was able to see that the recipient of the transfer from CDIF (which were sent to Sonea's account) was another person or entity.

This was the information not known to Sonea - in fact she still does not know the name of the intended recipient.

TD Bank froze her account, the wires to plaintiff's payment agent were reversed, and the Bitcoin disappeared.

The funds for the purchase are with TD Bank - Plaintiff should be claiming against TD Bank for freezing the accounts and against TD Bank for freezing the accounts and not allowing the payments to go through.

II
DEFENSES

In this section, state any legal theories that, even assuming that what plaintiff has alleged in the complaint is true, do not permit the plaintiff to win the case. Attach additional sheets of paper as necessary.

FIRST DEFENSE:

SECOND DEFENSE:

THIRD DEFENSE:

WHEREFORE defendant asks this Court to dismiss the complaint and enter judgment in favor of defendant.

[If you have any counterclaim against the plaintiff that arises out of the same events or transactions stated in the complaint, and/or any crossclaims against the other defendants that arise out of the same events or transactions stated in this complaint, and/or any third-party claims you have against third-parties (that is, someone not already named in the lawsuit) that arise out of the same events or transactions stated in the complaint, you should attach additional sheets of paper to set forth the facts and bases for any such claims. See the Pro Se Manual for a further explanation.]

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of June, 2021

Signature of Defendant

Address

Telephone Number

Fax Number (if you have one)

Sorel G. Sullivan
151 Park Avenue
MIDWINT VERNON, NY 10550
914-255-8079 OR 914-663-8480

